



# POLICY

## Processing of personal data

On this day, 01/08/2020, the following policy has been drawn up for Kominox OÜ.

We take care of your privacy. You should be able to feel secure when entrusting your personal data to us. For this reason, we have drawn up this policy. It is based on current data protection legislation and clarifies how we work to safeguard your rights and privacy.

The purpose of this policy is to make you aware of how we process your personal data, what we use them for, who may view them and under what conditions, and how you can safeguard your rights.

### We are personal data controllers

Kominox OÜ with company registration number 11113799 and address

Laki põik 2,  
Tallinn Harjumaa 12915  
Estonia,

is responsible for the personal data processed about you. Kominox OÜ is therefore the data controller for your personal data. We process your data in the interest of Kominox group companies:

- Kominox International AB, Gothenburg, Sweden
- Kominox OÜ, Tallinn, Estonia
- Kominox AS, Oslo, Norway
- Kominox OY, Helsinki, Finland

### Why do we process your personal data?

We process your personal data in order to provide you with our services and products, i.e. only to enter into or fulfil a contract with you as a customer.

### What data do we collect about you – and why?

We strive to process as little personal data about you as possible. In order to be able to enter into and fulfil contracts with you, we need data to establish legal representative of your business which includes collection of such persons' first name, surname, e-mail address, address and other contact details. To monitor usefulness of materials available on our site for registered users, we track their access to those materials. Such materials include customer-specific price lists, stock balance reports and product specifications.

If you have not given us your consent, we do not use your personal data for marketing purposes.



## How do we protect your personal data?

Your security is important to us. Therefore, we have taken appropriate technical, organisational and administrative security measures to protect your personal data from unauthorised access and other unauthorised processing:

- We educate our employees to handle data responsibly;
- We carefully screen our job candidates and IT partners;
- We monitor decommissioning of hardware to ensure that no data leaves the company;
- We use only proven technologies in our business support IT systems;

We regularly analyse and evaluate the measures in order to ensure that protection of your data is as safe as possible.

## Who do we disclose your data to?

We do not disclose your data to other companies or organisations unless required by law or necessary to perform our statutory or contractual obligations towards you.

We may disclose your personal data to any of our partners, suppliers or subcontractors, but only if that is necessary for us to meet our obligations in relation to you as a customer. We never provide more personal data than is necessary.

When required by law, we may need to disclose your data to public authorities and other organisations. We may also need to disclose your data if it is necessary to exercise, establish or monitor our legal claims.

We never disclose your personal data to other companies or businesses for marketing purposes.

## On what legal basis do we process your personal data?

We only process the personal data that we need to enable us to perform our services or deliver our products to you, i.e. when we enter into or fulfil a contract with you. To the extent that we process further data, we will obtain your consent or ensure that processing is authorised on a different legal basis.

## How long do we process your personal data?

We retain data about you as a customer for the duration of the agreement with you and for a 7 years required by accounting laws thereafter.

## Processing of technical data and cookies

We use Google Analytics for tracking visitors and aggregating information about the traffic to our websites. Google privacy policy can be found [https://www.google.com/policies/privacy/?hl=en\\_US](https://www.google.com/policies/privacy/?hl=en_US) . Learn how to opt-out of Google Analytics tracking here: <https://tools.google.com/dlpage/gaoptout> .

We from time to time publish Facebook advertisements and use Facebook tracing technologies to track conversions from Facebook ads and remarket to users who have taken actions on our site. You can learn about Facebook privacy policy <https://www.facebook.com/about/privacy> .



From time to time we serve videos from youtube.com (Google) on our site. Google may collect your IP Address and your User Agent information, store and retrieve cookies on your browser, embed additional third-party tracking, and monitor your interaction with that embedded content, including correlating your interaction with the content with your account with that service, if you are logged in to that service. Youtube privacy policy is available [here](#).

Visitors of kominox.com who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using kominox.com, with the drawback that certain features of this website may not function properly without the aid of cookies.

## Your rights

When we process personal data about you, you as registered have a number of rights. You have the right to contact us at any time with respect to these, and if you wish to exercise any of the rights described below, you can reach us most easily at [info@kominox.com](mailto:info@kominox.com)

We reserve the right to take appropriate protective and security measures in order to ensure that you are the person you claim to be when you contact us. If you cannot satisfactorily demonstrate your identity, we may not be able to respond to your request.

### *Access to personal data*

You have the right to know what personal data we process about you. If you wish to know, you can get a compiled register extract from us that contains all the personal data we process about you.

### *Correction and deletion*

If we process your personal data incorrectly or if we no longer need the data, you are entitled to have it deleted. If the data is incomplete, you have the right to have it supplemented. Please keep in mind that we may not be able to provide you with our services if you request to have your personal data deleted.

### *Data portability*

In certain circumstances you have the right to receive the data that we process about you in a general, written, machine-readable and structured format. You have the right to do so for the personal data that you have provided to us and which we process with your consent or when the personal data is required to enter into or complete an agreement.

### *Restrictions to processing*

Under certain conditions, you have the right to request that we restrict our processing of your data. This means that we mark the data so that in future we only process it for certain specific purposes. We may not be able to provide you with our services if we restrict the processing of your personal data.

### *Right to make objections*



You have the right to object to the processing of personal data that is carried out to perform a task in the public interest, as part of an exercise by a public authority or after a balance of interests. We do not process your personal information for any of these purposes or on any of these grounds. Therefore, you cannot direct any objections towards our processing on this basis.

#### *Right to lodge a complaint*

You have the right to lodge a complaint with the Swedish Data Protection Authority if you believe that we are processing your personal data in an inappropriate manner. You can read more about this on the Swedish Data Protection Authority's website [www.datainspektionen.se](http://www.datainspektionen.se).

#### **Contact**

You can contact us at any time by writing to [info@kominox.com](mailto:info@kominox.com) or by calling us on phone number +372 6 645815 if you wish to learn more about how we process your personal data. You can also read more about us on our website [www.kominox.com](http://www.kominox.com).